

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEF
ANSORGE IN SUPPORT OF GOOGLE
LLC'S ADMINISTRATIVE MOTION
UPDATING THE COURT ON ITS
PRESERVATION IMPLEMENTATION
EFFORTS AND SEEKING RELIEF
FROM THE JULY 30 DEADLINE
IMPOSED BY THE JULY 15, 2022
PRESERVATION ORDER (DKT. 630)**

Judge: Hon. Susan van Keulen, USMJ

Case No. 4:20-cv-03664-YGR-SVK

1 I, Josef Ansorge, declare as follows:

2 1. I am a member of the bar of the District of California and Of Counsel with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google in this action. I submit this
4 declaration in support of Google LLC's Administrative Motion Seeking Relief from the July 30
5 Deadline Imposed by the July 15, 2022 Preservation Order (Dkt. 630) ("Motion Seeking Relief"). I
6 make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness,
7 I could and would testify competently thereto.

9 2. On July 26, 2022, Google wrote twice to Plaintiffs regarding the Motion Seeking
10 Relief and requested a meet and confer.

11 3. On July 27, 2022, I met and conferred with Plaintiffs' Counsel Mark C. Mao and
12 Ryan McGee to discuss Google seeking relief from the July 30, 2022 deadline to complete the
13 decryption and re-encryption pipeline for sensitive rotating keys. The parties were not able to reach
14 any stipulation regarding Google's Motion Seeking Relief. At the time of filing, Plaintiffs did not
15 oppose or support Google's Motion Seeking Relief and reserved all rights.

17 I declare under penalty of perjury of the laws of the United States that the foregoing is true
18 and correct. Executed in Washington D.C. on July 27, 2022.

20 By /s/ Josef Ansorge
21 Josef Ansorge